



July 6, 2017

**Ex Parte**

Marlene H. Dortch, Secretary  
Federal Communications Commission  
445 12th Street SW  
Washington, DC 20554

*Re: Expanding the Economic and Innovation Opportunities of Spectrum Through Incentive Auctions, and related issues (GN Docket No. 12-268; ET Docket No. 14-165; MB Docket No. 15-146; ET Docket No. 16-56)*

Dear Ms. Dortch:

We represent business leaders and investors from New York City's robust and growing technology sector who care deeply about the continued technological sophistication and relevance of the United States and its citizens. We are writing to ask you to help increase access to broadband across the country by rolling back restrictions on the use of low-frequency, "white-space" spectrum.

As you know, at least 34 million Americans live in communities without access to broadband, with a majority of those living in rural areas. Here in New York State, approximately 2.5 million homes have limited or no access to broadband internet. This is a sad state of affairs for a country that others look to as a technology innovator and leader, where broadband has been available to urban and suburban Americans for almost two decades.

We have seen the tremendous benefits that robust access to broadband internet can have for businesses, entrepreneurs, and individuals across all industry sectors and income levels. For example, when the city of Chattanooga [invested](#) in ubiquitous fiber optic internet access in 2009 it quickly became a bustling technology hub, attracting \$1 billion in investments and generating thousands of new jobs.

Fortunately, this is an easy problem to solve. Consistent with its digital switchover mandate, the FCC should reallocate the large swaths of unused wireless spectrum below 700 MHz to "super WiFi" by preserving at least three channels in that range in every U.S. market.

At this point, the technology is sufficiently advanced to avoid interference with signals on frequencies above 700 MHz and unregulated, low-power stations operating at lower frequencies. That's why the National Association of Broadcasters dropped all opposition to use



of white space spectrum over five years ago. In fact, a number of technology companies and broadband providers have been operating successful white-space wireless pilot projects in North Carolina, Virginia, Washington, and Georgia. This technology works, and has (1) substantially increased access to telemedicine healthcare services for patients; (2) enhanced education opportunities for students; and (3) advanced agricultural applications that would not have been possible without this technology.

The technology community is ready to deploy low-frequency wireless technology that would expand broadband availability into these underserved areas, offering consumers and businesses speeds up to 450 Mbps over the air. All it takes for this investment in our future is a simple act of deregulation by this FCC.

Don't let this country fall further behind in access to broadband by letting this underused resource go to waste. Please keep your pledge to ensure access to broadband for all Americans by finalizing rules that will permit use of this valuable wireless spectrum for cheap and ubiquitous broadband access by freeing up at least three white space channels from the existing unused spectrum. All Americans want to participate in the information economy. We should give them that opportunity.

Pursuant to the Commission's rules, a copy of this notice is being filed electronically in the above-referenced dockets. If you require any additional information please contact the undersigned

Sincerely,

Julie Samuels  
Executive Director, Tech:NYC